

Zachary A. Hummel
BRYAN CAVE LLP
1290 Avenue of the Americas
New York, New York 10104
(212) 541-2000

Attorneys for Defendant Document Technologies, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WILLIAM HENIG, on behalf of himself and
others similarly situated

Plaintiff,

vs.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP, et al.,

Defendants.

Civil Action No. 13-CV-1432

MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Zachary A. Hummel of Bryan Cave LLP hereby enters his appearance on behalf of Defendant Document Technologies, LLC. (“DTI”) (improperly named as Providus New York, LLC) and moves the Court for an extension of 25 days, up to and including April 26, 2012, to file its responsive pleading to this matter. In support of its motion, DTI states as follows:

1. Providus New York, LLC is no longer an active company. Following a corporate merger, Providus is now succeeded by DTI. Providus New York, LLC was served via the New York Secretary of State on March 11, 2013.

2. DTI was served at Providus’s office via certified mail on March 20, 2013. Based on that service, it is DTI believes that a responsive pleading is due no later than April 9, 2013, twenty one days after DTI receive the summons.

3. Nevertheless, the Court's docket sheet states that, based on the service on the New York Department of State, a responsive pleading is due on April 1, 2013.

4. In an abundance of caution, counsel for DTI attempted to contact Plaintiff's counsel to obtain consent to an extension of time for a responsive pleading until April 26, 2013. The voicemail message of Plaintiff's counsel indicates that the firm is closed until April 3, 2013.

5. It is the understanding of DTI that Plaintiff has given co-Defendant Quinn Emmanuel its consent to an extension to file a responsive pleading up to and including April 26, 2013.

6. No previous extensions to file this response have been sought.

7. The request for an extension of time is not made for the purpose of delay and will not result in prejudice to any party.

WHEREFORE, for the reasons stated above, Defendant DTI requests the Court to enter an order extending the deadline to respond to Plaintiff's Complaint to April 26, 2013.

Dated: April 1, 2013
New York, New York

Respectfully submitted,
Bryan Cave, LLP

/s/ Zachary A. Hummel
Zachary A. Hummel
BRYAN CAVE LLP
1290 Avenue of the Americas
New York, New York 10104
(212) 541-2000
zahummel@bryancave.com
Attorneys for Defendant Document
Technologies, LLC

CERTIFICATE OF SERVICE

This certifies that on the April 1, 2013 a copy of the foregoing was sent to all counsel of record herein, by this Court's CM/ECF electronic notice system.

/s/ Zachary A. Hummel